

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALAN DANIELS,
[DOB: 04/16/1961]

Defendant.

Case No. 21-00008-01-CR-W-BP

COUNT ONE:

(Intentional Damage to a Protected Computer)

18 U.S.C. § 1030(a)(5)(A)

NMT: 10 Years Imprisonment

NMT: 3 Years Supervised Release

NMT: \$250,000 Fine

Class C Felony

COUNT TWO:

(Communication Interference)

18 U.S.C. § 1362

NMT: 10 Years Imprisonment

NMT: 3 Years Supervised Release

NMT: \$250,000 Fine

Class C Felony

\$100 Mandatory Special Assessment Each Count

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

(Intentional Damage to a Protected Computer)

On or about October 5, 2017, in the Western District of Missouri, the defendant, ALAN DANIELS, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, to wit, DANIELS, while working as a contractor at Whiteman Air Force Base, did intentionally delete data which caused a temporary shutdown of all Voice over Internet Protocol communication at Whiteman Air Force Base, and the offense caused a threat to public health and safety, the offense caused damage affecting a computer system used by and for an entity

of the United States in furtherance of the administration of justice, national defense, and national security, and the offense caused loss to persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, all in violation of Title 18, United States Code, Section 1030(a)(5)(A) and (c)(4)(B).

COUNT TWO
(Communication Interference)

On or about October 5, 2017, in the Western District of Missouri, the defendant, ALAN DANIELS, willfully and maliciously did injure and destroy the works, property, and material of a telephone or cable, line, station, or system, or other means of communication, operated and controlled by the United States, and used and intended to be used for military and civil defense functions of the United States, and did willfully and maliciously interfere with the working and use of such a line and such a system, and willfully and maliciously obstruct, hinder, and delay the transmission of a communication over such line and system, specifically DANIELS, while working as a contractor at Whiteman Air Force Base, did intentionally delete data which caused a temporary shutdown of all Voice over Internet Protocol communication at Whiteman Air Force Base, all in violation of Title 18, United States Code, Section 1362.

Respectfully submitted,

Timothy Garrison
United States Attorney

By /s/ Matthew P. Wolesky

Matthew P. Wolesky
Assistant United States Attorney

Dated: 01/21/21
Kansas City, Missouri